

**IN THE UNITED STATES DISTRICT COURT FOR  
THE WESTERN DISTRICT OF PENNSYLVANIA**

**RENEE ZINSKY,**

Civil Action No. 2:22-cv-547(MJH)

Plaintiff,

The Honorable Marilyn J. Horan

vs.

**MICHAEL RUSSIN, RUSSIN  
FINANCIAL, RUSSIN GROUP, SIMON  
ARIAS, III, ARIAS AGENCIES, S.A.  
ARIAS HOLDINGS, LLC, AMERICAN  
INCOME LIFE INSURANCE COMPANY,**

ELECTRONICALLY FILED

Defendants.

**REPLY DECLARATION OF JEFFREY HAMMER IN SUPPORT OF  
AMERICAN INCOME LIFE INSURANCE COMPANY'S  
MOTION TO CONFIRM ARBITRATION AWARD**

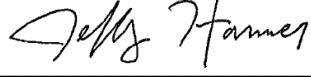
Jeffrey Hammer, under the pains and penalties of perjury, states:

1. I am an attorney admitted to practice in the State of California. I am an attorney at King & Spalding LLP, counsel for Defendant American Income Life Insurance Company ("AIL") in the above-referenced matter. I submit this declaration in support of AIL's Reply in support of its Motion to Confirm Arbitration Award. I have personal knowledge of the facts stated herein, and could and would testify competently thereto if called as a witness in this matter.

2. A true and correct and copy of the transcript of the March 4, 2024 proceedings in the matter of *Zinsky v. Arias Agencies, et al.*, AAA Case 01-22-0004-0849 (the "Arbitration"), is attached hereto as **Exhibit A**.

3. Prior to filing the attached transcript (Exhibit A), AIL provided notice to the parties to the Arbitration in order to provide them an opportunity to move to seal as required by the Protective Order in the Arbitration. AIL previously notified the parties to the Arbitration under the same procedure before filing Dkt. Nos. 118-1 and 127-1 in this action.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. This declaration was signed on March 25, 2023 in Pasadena, California.

  
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Jeffrey Hammer